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Attorney for Plaintiff

**UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA**

IKELENE BOH,)	
)	
Plaintiff,)	CASE NO.
)	2:23-cv-00198-EJY
v.)	
)	UNOPPOSED MOTION
)	FOR EXTENSION OF TIME TO FILE
KILOLO KIJAKAZI, ACTING)	PLAINTIFF'S BRIEF
COMMISSIONER OF SOCIAL SECURITY,)	
)	
Defendant.)	
_____)	

Plaintiff by her attorney, moves for a sixty-one (61) day extension of time to file Plaintiff's opening brief. Plaintiff's opening brief is currently due to be filed May 10, 2023.

Counsel requests this extension due to multiple, simultaneous filing deadlines. Counsel requires additional time to properly and thoroughly prepare Plaintiff's brief. For instance, between May 5, and June 23, 2023, staff in Counsel's office have one hundred and seventy-seven (177) Plaintiff briefs due. This figure does not include Oral Arguments, appeals to Circuit Courts, Reply Briefs, settlement negotiations, and the various other tasks which arise throughout the course of litigation. These circumstances do not allow for Plaintiff's Counsel to properly prepare the brief by the current deadline. This request will not cause Defendant any undue

1 hardship. This extension is needed to thoroughly and properly prepare the brief by the current
2 deadline.

3 Wherefore, Plaintiff requests an extension from May 8, 2023, up to and including July
4 10, 2023 to file their brief. Counsel for the Plaintiff has conferred with Defendant's Counsel who
5 has no objection to this request.
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7 Dated May 2, 2023.

8 Respectfully submitted,

9 /s/Hal Taylor

10 Hal Taylor, Esq.

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12 IT IS SO ORDERED:

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15 UNITED STATES MAGISTRATE JUDGE
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17 Dated: May 2, 2023
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